## REMARKS/ARGUMENTS

### The Rejection under 35 U.S.C. § 112, First Paragraph

The Office Action has rejected claims 1-11 under 35 U.S.C. § 112, first

paragraph as failing to comply with the written description requirement. The language

referred to in the Office Action has been deleted, and claims 1, 6 and 7 have been

amended.  Accordingly, the Examiner is respectfully requested to withdraw the

rejection based upon 35 U.S.C. § 112, first paragraph.

### The Rejection of Claims 1 and 11 under 35 U.S.C. § 103

Claims 1 and 11 stand rejected under 35 U.S.C. § 103(a) as being unpatentable

over Figures 9-11 ("AAPA" – Applicant's admitted prior art) in view of Nobutani et al.

("Nobutani") (U.S. Patent No. 5,736,981) and Hanami et al. ("Hanami") (U.S. Patent No.

6,125,432).  Applicants respectfully traverse this rejection, and request allowance for

the following reasons.

### The Claims are Patentable Over the Cited References

#### The AAPA

The prior art described in FIG. 9 shows a display control device of a command

control type having an image data writing means, a graphics memory for storing write

data from the image data writing means, and a data transfer means.  The data transfer

means reads data from the graphics memory and provides said data to a memory in a

display means. A single screen of data, defined by horizontal and vertical addresses, is transferred from graphics memory to the memory in the display means. Whenever the screen is to be updated, the entire screen of data is stored in the graphics memory is transferred.

### The Nobutani Patent

The Nobutani patent appears to be substantially cumulative of the prior art described in Fig. 9, and there appears to be no disclosure that the display or FLCD 20 includes a memory. Nobutani does disclose that the screen data in the memory of the FLCD controller 240 is partially updated using a rewrite detector. The updated screen of data appears to be sent as a single screen to the FLCD. (See step S507, Fig. 43). There appears to be no disclosure of Applicants' claimed data transfer means which sends only the arbitrary image data to be updated which is rewritten partially in the memory of the display means, and together with the data in the other region already in the memory of the display means, are read as data for one screen.

### The Hanami Patent

The Hanami patent also appears to be substantially cumulative of the prior art described in Fig. 9, and there appears to be no disclosure that the display or CRT 14 includes a memory. Hanami discloses a frame buffer 7 memory, but there is no disclosure of partially updating the frame buffer 7. The Hanami patent has been cited as disclosing Applicants' claimed image data transfer means. The Applicants

respectfully submit that the image data transfer means of Hanami is not the same as Applicants' claimed image data transfer means.

**The Combination of the AAPA, Nobutani and Hanami**

The Applicants respectfully submit that even if the AAPA, Nobutani and Hanami references are combined as suggested in the Office Action the resulting combination would not result in the Applicants' claimed invention. The hypothetical combination would modify the system of Fig. 9 (AAPA) by substituting Nubtani's FLCD controller 240 for the graphics memory 2 (AAPA), and by substituting the frame buffer 7 for the data transfer means 3 (AAPA). The resulting hypothetical combination would not function the same as the Applicants' claimed invention because the frame buffer 7 would simply transfer the <u>entire</u> rewritten image provided by the FLCD controller 240 to the memory 5 of the AAPA display device. Accordingly, the hypothetical combination would not be capable of <u>partially rewriting the image data to be updated in the memory of the display means, and together with the data in the other region already in the memory of the display means, be read as data for one screen.</u>

There is simply no motivation to combine the references as suggested in the Office Action. It is respectfully that the only motivation to combine the references is impermissibly gleaned through hindsight obtained from the reading Applicants' specification. Accordingly, the Applicants respectfully request that the Examiner withdraw the rejection of claims 1 and 11.

## The Rejection of Claims 2-6 under 35 U.S.C. § 103

Claims 2-6 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Figures 9-11 in view of Nobutani, Hanami, and Shimizu (U.S. Patent No. 6,043,803). Applicants respectfully traverse this rejection, and request allowance for the following reasons. The Applicants respectfully submit that even if the AAPA, Nobutani, Hanami and Shimizu references are combined as suggested in the Office Action the resulting combination would not result in the Applicants' claimed invention. For the reasons explained above in connection with claims 1 and 11, the AAPA, Nobutani and Hanami do not disclose the Applicants' claimed feature of partially rewriting the image data to be updated in the memory of the display means, and together with the data in the other region already in the memory of the display means, be read as data for one screen. The Shimizu reference also does not disclose this claimed feature. Accordingly, Applicants respectfully submit that claims 2-6 are allowable for at least the same reasons as claims 1 and 11.

## The Rejection of Claims 7-10 under 35 U.S.C. § 103

Claims 7-10 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Figures 9-11 in view of Hanami and Shizmizu. Applicants respectfully traverse this rejection, and request allowance for the following reasons. The Applicants respectfully submit that even if the AAPA, Hanami and Shimizu references are combined as suggested in the Office Action the resulting combination would not result in the Applicants' claimed invention. For the reasons explained above in connection with

claims 1 and 11, the AAPA, and Hanami do not disclose the Applicants' claimed feature

of <u>partially rewriting the image data to be updated in the memory of the display means,</u>

<u>and together with the data in the other region already in the memory of the display</u>

<u>means, be read as data for one screen</u>.   The Shimizu reference also does not disclose

this claimed feature.  Accordingly, Applicants respectfully submit that claims 7-10 are

allowable for at least the same reasons as claims 1 and 11.


## Conclusion

In view of the amendments and remarks submitted above, it is respectfully

submitted that all of the remaining claims are allowable and a Notice of Allowance is

earnestly solicited.  Should there be any outstanding matters that need to be resolved

in the present application, the Examiner is respectfully requested to contact Richard J.

McGrath (Reg. 29,195) at telephone number (703) 205-8000, which is located in the

Washington, DC area.

If necessary, the Commissioner is hereby authorized in this, concurrent, and

future replies to charge payment or credit any overpayments to Deposit Account No.

02-2448 for any additional fees required under 37 C.F.R. §§1.16 or 1.17; particularly,

extension of time fees.

Respectfully submitted,
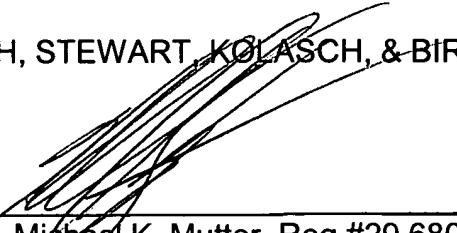
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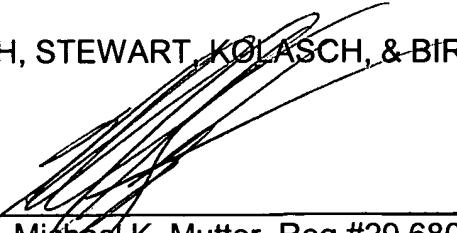
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